



Illinois Environmental Protection Agency

17772-6752

Refer to: 16064634 -- St. Clair County
East St. Louis/Pfizer
Permit No. 1980-3-DE

EPA Region 5 Records Ctr.



390938

February 2, 1983

Pfizer, Inc.
2001 Lynch Avenue
East St. Louis, Illinois 62201

William A. Wilkinson
2001 Lynch Avenue
East St. Louis, Illinois 62201

Attention: Jeffrey C. Carlton

Gentlemen:

Permit is hereby granted to William A. Wilkinson and Pfizer, Inc. to DEVELOP a solid waste management site to treat spent pickle liquor, the location of this site described in Exhibit B listed below, all according to the application and plans submitted by Jeffrey C. Carlton. The application and plans consist of:

1. Cover letter dated November 19, 1982,
2. Application for permit to develop a waste storage/treatment site dated November 19, 1982 (3 pages),
3. Authorization notification,
4. 7 pages of additional information,
5. Location map (Exhibit A), 1 page,
6. Legal description of the site (Exhibit B) (6 pages),
7. Plan sheet C-7513,
8. Treatment flow diagrams (Exhibits D and E) (2 pages),
9. Metals analysis dated October 8, 1980 (Exhibit F),
10. Copy of special waste stream permit (Exhibit G),
11. Pollution Incident Prevention, Control and Reporting Plan for the Pfizer East St. Louis Plant (Exhibit H) (10 pages),
12. Copy of completed special waste hauling manifest (Exhibit I),
13. Inspection forms (Exhibits J and K),

14. Exhibit H, and

15. Plant sheet D7336 (Exhibit L),

all received November 10, 1982.

This permit is issued subject to the standard conditions attached hereto and incorporated herein by reference, and is further subject to the following special conditions:

1. This is a development permit. An operating permit is necessary to be in full compliance with this Division.
2. This facility shall be developed and operated in accordance with Chapter 2, 3, 7 and 9 of the Illinois Pollution Control Board Rules and Regulations.
3. Special wastes received at the site for recovery shall be transported to the facility utilizing the Agency's supplemental permit system and manifest system.
4. Special wastes generated at the site for disposal, storage, incineration or further treatment elsewhere shall be transported to the receiving facility utilizing the Agency's supplemental permit system and manifest system.
5. This permit is subject to review and modification by the Agency as deemed necessary to fulfill the intent and purpose of the Environmental Protection Act, and all applicable environmental rules and regulations.
6. This permit is issued with the expressed understanding that no process discharge to Waters of the State or to a sanitary sewer will occur from these facilities. If such discharge occurs, additional or alternate facilities shall be provided. The construction of such additional or alternate facilities may not be started until a permit for their construction has been issued by the Agency.
7. Any modification to the facility, treatment process, types or classes of wastes handled shall be the subject of an application for supplemental permit for site modification submitted to this Agency.
8. Permittee shall notify the Agency of any changes from the information submitted to the Agency in its application for a developmental and operating permit for this site. Permittee shall notify the Agency of any changes in the names or addresses of both beneficial and legal titleholders to the herein-permitted site. Such notification shall

be made in writing within fifteen (15) days of such change and shall include the name or names of any parties in interest and the address of their place of abode; or, if a corporation, the name and address of its registered agent.

9. The application for operating permit shall contain:

- a. a contingency plan fulfilling the requirements of 35 Ill. Adm. Code Part 725, Subpart D,
- b. documentation that the Emergency Coordinator is authorized to commit the resources needed to carry out the plan (Section 725.155),
- c. documentation that copies of the plan have been sent to the proper authorities (Section 725.153),
- d. a schedule for inspecting emergency equipment listed in the contingency plan (Sections 725.115(b)(1) and 725.153(e)), and
- e. documentation of personnel training in compliance with Section 721.116.

10. All pickle liquor storage tanks and neutralizers shall be inspected daily to ensure that there is at least 2 feet of freeboard in each tank (Section 725.294(c) and 725.292(c)).

11. All pickle liquor storage tanks and neutralizers shall be inspected weekly to detect corrosion or leaking of fixtures or seams (Section 725.294(d)).

12. Records must be made of all inspections required by this permit. These records shall include the date and time of the inspection, the name of the inspector, a notation of the observations made and the date and nature of any repairs or other remedial actions (Section 725.115(c)).

Very truly yours,

Thomas E. Cavanagh, Jr., Manager
Permit Section
Division of Land Pollution Control

TEC:RLM:sd/sp/6283c/1-3

cc: Division File
Compliance Section
Southern Region

STANDARD CONDITIONS FOR CONSTRUCTION/DEVELOPMENT PERMITS
ISSUED BY THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

July 1, 1979

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) grants the Environmental Protection Agency authority to impose conditions on permits which it issues.

These standard conditions shall apply to all permits which the Agency issues for construction or development projects which require permits under the Divisions of Water Pollution Control, Air Pollution Control, Public Water Supplies, and Land and Noise Pollution Control. Special conditions may also be imposed by the separate divisions in addition to these standard conditions.

1. Unless this permit has been extended or it has been voided by a newly issued permit, this permit will expire one year after date of issuance unless construction or development on this project has started on or prior to that date.
2. The construction or development of facilities covered by this permit shall be done in compliance with applicable provisions of Federal laws and regulations, the Illinois Environmental Protection Act, and Rules and Regulations adopted by the Illinois Pollution Control Board.
3. There shall be no deviations from the approved plans and specifications unless a written request for modification of the project, along with plans and specifications as required, shall have been submitted to the Agency and a supplemental written permit issued.
4. The permittee shall allow any agent duly authorized by the Agency upon the presentation of credentials:
 - a. to enter at reasonable times the permittee's premises where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit.
 - b. to have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit.
 - c. to inspect at reasonable times, including during any hours of operation of equipment constructed or operated under this permit, such equipment or monitoring methodology or equipment required to be kept, used, operated, calibrated and maintained under this permit.

- d. to obtain and remove at reasonable times samples of any discharge or emission of pollutants.
 - e. to enter at reasonable times and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring, or recording any activity, discharge, or emission authorized by this permit.
5. The issuance of this permit:
- a. shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are to be located;
 - b. does not release the permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the proposed facilities;
 - c. does not release the permittee from compliance with other applicable statutes and regulations of the United States, of the State of Illinois, or with applicable local laws, ordinances and regulations;
 - d. does not take into consideration or attest to the structural stability of any units or parts of the project;
 - e. in no manner implies or suggests that the Agency (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the proposed equipment or facility.
6. Unless a joint construction/operation permit has been issued, a permit for operating shall be obtained from the Agency before the facility or equipment covered by this permit is placed into operation.
7. These standard conditions shall prevail unless modified by special conditions.
8. The Agency may file a complaint with the Board for modification, suspension or revocation of a permit:
- a. upon discovery that the permit application contained misrepresentations, misinformation or false statements or that all relevant facts were not disclosed; or
 - b. upon finding that any standard or special conditions have been violated; or
 - c. upon any violation of the Environmental Protection Act or any Rule or Regulation effective thereunder as a result of the construction or development authorized by this permit.